

MELINDA HAAG (CABN 132612)  
United States Attorney

J. DOUGLAS WILSON (DCBN 412811)  
Chief, Criminal Division

STEPHANIE M. HINDS (CABN 154284)  
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102-3495  
Telephone: (415) 436-6816  
FAX: (415) 436-7234  
Email: stephanie.hinds@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA,	)	CASE NO: CV13-5139 SBA
	)	
Plaintiff,	)	STIPULATED SETTLEMENT AGREEMENT AND
	)	ORDER
v.	)	
	)	
APPROXIMATELY \$156,960 IN UNITED	)	
STATES CURRENCY, ET AL.,	)	
	)	
Defendants.	)	
	)	
	)	

Plaintiff, United States of America and Claimant, Scot Raymond Combs, in full settlement of all issues directly and indirectly related to the captioned case and the seizure, detention and forfeiture of the following property:

- a. \$156,960 in United States Currency
- b. \$16,862.15 in funds seized from US Bank, Acct No xxxxxxxx2648
- c. \$8,698.51 in funds seized from Chase Bank Acct No xxxxxx7180
- d. \$7,993.05 in funds seized from Bank of America Acct No xxxxxxxx2981

1 e. \$4,957.43 in funds seized from Union Bank Acct No xxxxxx6307 (collectively  
2 hereinafter as “defendant funds”)

3 f. Real Property and Improvements located at 170 Tioga Lane, Greenbrae (Kentfield),  
4 California (hereinafter as “defendant real property”)

5 hereby stipulate and agree as follows:

6 1. On November 4, 2013, Plaintiff filed its Complaint for Forfeiture against the defendant  
7 funds and defendant real property. In its Complaint, plaintiff alleged that the defendant funds was  
8 subject to forfeiture, pursuant to 21 U.S.C. § 881(a)(6), as monies which constitute proceeds from drug  
9 trafficking and/or funds furnished to person in order to facilitate the distribution and/or cultivation of a  
10 controlled substance and the defendant real property was subject to forfeiture pursuant to 21 U.S.C. §  
11 881(a)(7), as property used to facilitate the cultivation of marijuana.

12 2. Scot Raymond Combs is the sole claimant to the defendant funds and defendant real  
13 property.  
14

15 3. This settlement is a civil compromise between the parties and not an admission of  
16 liability by either party.

17 4. For the purpose of this settlement only, Plaintiff agrees to dismiss the action against the  
18 defendant real property and agrees to release the lis pendens filed with the Marin County Recorder’s  
19 Office. The dismissal and release of the lis pendens shall be in full settlement and satisfaction of any and  
20 all claims by Claimant, his heirs, representatives and assignees to the defendant real property in regards  
21 to this action.  
22

23 5. For the purpose of this settlement only, Claimant does not dispute Plaintiff’s  
24 representation here that sufficient evidence exists to establish forfeiture of the defendant funds, pursuant  
25 to 21 U.S.C. § 881(a)(6), and thus consents to the forfeiture of the defendant funds to the United States  
26 without further notice to him. Claimant further relinquishes all right, title and interest in the defendant  
27  
28

1 funds, and agrees that said property shall be forfeited to the United States and disposed of according to  
2 law by the United States.

3 6. For the purpose of this settlement only, Claimant shall hold harmless the United States of  
4 America, The United States Drug Enforcement Administration and all agents, officers and employees  
5 thereof including any and all state and local law enforcement officers, for any and all acts directly or  
6 indirectly related to the seizure, detention and forfeiture of the defendant funds and defendant real  
7 property.  
8

9 7. Each party shall pay its own attorneys' fees and costs.

10 8. Subject to the Court's approval, the parties agree that this action shall be dismissed and  
11 that the proposed Judgment of Forfeiture which is submitted with this Settlement Agreement be entered.

12 IT IS SO STIPULATED:

13 Dated:

MELINDA HAAG  
United States Attorney

14  
15  
16 \_\_\_\_\_  
STEPHANIE M. HINDS  
Assistant United States Attorney

17 Dated:

18  
19 \_\_\_\_\_  
DAVID MICHAEL, ESO  
Attorney for Scot Raymond Combs

20 Dated:

21  
22 \_\_\_\_\_  
SCOT RAYMOND COMBS  
Claimant

23  
24 BASED ON THE FOREGOING STIPULATION, IT SO ORDRED ON THIS 21<sup>st</sup> DAY OF  
25 January, 2013.

26 \_\_\_\_\_  
SAUNDRA B. ARMSTRONG  
27 United States District Judge  
28